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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**UNDER
SEAL**

UNITED STATES OF AMERICA

Case No. 3:14-cr-00267-BR
INDICTMENT

v.

**FABIAN SANDOVAL-RAMOS,
PLACIDO RAMIREZ-CORONEL,
RAUL ARCILA,
SHANE GLENN BAKER,
MICHAEL JAMES ROSA, and
MORGAN ELIZABETH GODVIN,**

**21 U.S.C. §§ 841(a)(1), (b)(1)(C)
21 U.S.C. §§ 841(b)(1)(A)(i)
21 U.S.C. §§ 841(b)(1)(B)(i)
21 U.S.C. § 846
21 U.S.C. § 853
18 U.S.C. § 2**

UNDER SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1:

**[Conspiracy to Distribute Heroin Resulting in Death]
21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C)**

On or between March 20 and April 4, 2014, in the District of Oregon, defendants **FABIAN SANDOVAL-RAMOS, PLACIDO RAMIREZ-CORONEL, RAUL ARCILA, SHANE GLENN BAKER, MICHAEL JAMES ROSA and MORGAN ELIZABETH GODVIN**, did knowingly and willfully combine, conspire, confederate and agree with each other and with others both known and unknown to the Grand Jury, to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. The Grand Jury further charges that this conspiracy distributed heroin, the use of which resulted in the death of another person, to wit: defendants conspired to distribute heroin which was ultimately used by victim "J.D." in Washington County, Oregon, whose use of said

heroin caused his death, all in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 2:
[Conspiracy to Distribute Heroin]
21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(i)

Beginning in February 2014 and continuing through April 2014, in the District of Oregon, defendants **FABIAN SANDOVAL-RAMOS, PLACIDO RAMIREZ-CORONEL, RAUL ARCILA, and SHANE GLENN BAKER** did knowingly and willfully combine, conspire, confederate and agree with each other and with others both known and unknown to the Grand Jury, to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(A)(i), that this violation involved 1,000 grams or more of a mixture or substance containing a detectable amount of heroin.

COUNT 3:
[Conspiracy to Distribute Heroin]
21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)(i)

Beginning in a time unknown in 2013 and continuing through April 2014, in the District of Oregon, defendants **SHANE GLENN BAKER, MICHAEL JAMES ROSA and MORGAN ELIZABETH GODVIN** did knowingly and willfully combine, conspire, confederate and agree with each other and with others both known and unknown to the Grand Jury, to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(i), that this violation involved 100 grams or more of a mixture or substance containing a detectable amount of heroin.

COUNT 4:
[Distribution of Heroin]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)

On or about March 29, 2014, in the District of Oregon, defendant **MORGAN ELIZABETH GODVIN** did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5:
[Possession with the Intent to Distribute Heroin]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)

On or about March 29, 2014, in the District of Oregon, defendants **MICHAEL JAMES ROSA** and **MORGAN ELIZABETH GODVIN** did knowingly and intentionally possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6:
[Possession with the Intent to Distribute Methamphetamine]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)

On or about March 29, 2014, in the District of Oregon, defendant **MICHAEL JAMES ROSA** did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7:
[Possession of a Firearm in Furtherance of Drug Trafficking]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i)

On or about March 29, 2014, in the District of Oregon, defendant **MICHAEL JAMES ROSA** did knowingly possess a firearm: a Smith and Wesson .40 caliber pistol, model SSW40F, bearing serial number PAJ2875, in furtherance of a drug trafficking crime for which he may be

prosecuted in a court of the United States, to wit: Conspiracy to Distribute Heroin (as alleged in Count 3), Possession with Intent to Distribute Heroin and Methamphetamine (as alleged in Counts 5 and 6) all in violation of Title 18, United States Code, Section 924(c).

COUNT 8:
[Distribution of Heroin]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)

On or about March 30, 2014, in the District of Oregon, defendant **SHANE GLENN BAKER** did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9:
[Possession with the Intent to Distribute Heroin]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i)

On or about March 31, 2014, in the District of Oregon, defendants **PLACIDO RAMIREZ-CORONEL** and **RAUL ARCILA** did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(i), that this violation involved 100 grams or more of a mixture or substance containing a detectable amount of heroin.

COUNT 10:
[Possession with the Intent to Distribute Heroin]
21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(i)

On or about April 2, 2014, in the District of Oregon, defendants **PLACIDO RAMIREZ-CORONEL** and **RAUL ARCILA** did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(i),

that this violation involved 100 grams or more of a mixture or substance containing a detectable amount of heroin.

CRIMINAL FORFEITURE ALLEGATION – CONTROLLED SUBSTANCES

Upon conviction for any of the offenses alleged in Counts 1 through 11 of this indictment, **FABIAN SANDOVAL-RAMOS, PLACIDO RAMIREZ-CORONEL, RAUL ARCILA, SHANE GLENN BAKER, MICHAEL JAMES ROSA** and **MORGAN ELIZABETH GODVIN**, defendants herein, shall forfeit to the United States pursuant to Title 21 United States Code, Section 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1-11 of this Indictment.

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CRIMINAL FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count 7 of this indictment, defendant **MICHAEL JAMES ROSA**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearm and all associated ammunition involved in that offense, including without limitation:

1. a Smith and Wesson .40 caliber pistol, model SSW40F, bearing serial number PAJ2875
2. gun magazine containing 15 rounds

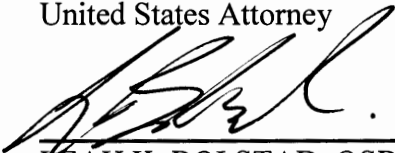
DATED this 24th day of June 2014.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney


LEAH K. BOLSTAD, OSB #052039
Assistant United States Attorney